

GLENN H. RIPA
ATTORNEY AT LAW
305 BROADWAY
Suite 301
New York, NY 10007

Email: GHRIPAESQ@aol.com
MEMBER N.Y. & N.J BAR

Tel (212) 732-5310
Fax (888) 453-0788

August 26, 2022

Via ECF

Hon. J. Paul Oetken
United States Courthouse
40 Foley Square
New York, NY 10007

Re: Flores et al v. Quesadillas Dona Maty Corp et al
Index No 1:21-cv-07947-JPO

Dear Judge Oetken:

Plaintiffs have filed a letter with the court to requesting a Certificate of Default be entered in this matter against the Defendants based upon the Defendants failure to respond to discovery requests that were due earlier this week.

I respectfully request the court to grant the Defendants a two-week extension to respond to the discovery requests which would be due on Friday September 9, 2022.

My client Matilde Herrera is an elderly Spanish woman who has trouble understanding the English language. She did not understand the discovery requests and I am now working with her adult children to assist me in completing the discovery process.

Very truly yours,

/s/ Glenn H. Ripa

Glenn H Ripa

CC Ramsha Ansari, Esq
Via ECF

